

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PHARO GAIA FUND, LTD. and PHARO
MACRO FUND, LTD.,

Plaintiffs,

v.

THE BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 19-cv-3123 (AT)
Related to 18-cv-11940 (AT)

NOTICE OF MOTION FOR RELIEF PURSUANT TO 28 U.S.C. § 1610(C)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated January 26, 2021, and the accompanying Declaration of Matthew D. McGill, dated January 26, 2021, Plaintiffs Pharo Gaia Fund, Ltd. and Pharo Macro Fund, Ltd., by and through their undersigned counsel, make a motion to this Court before the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order pursuant to 28 U.S.C. § 1610(c) determining that a reasonable period of time has elapsed since this Court's October 16, 2020 Final Judgment order against Defendant Bolivarian Republic of Venezuela.

Dated: January 26, 2021

Respectfully submitted,

/s/ Matthew D. McGill

Matthew D. McGill

MMcGill@gibsondunn.com

1050 Connecticut Avenue, N.W.

Washington, DC 20036

(202) 887-3680

Anne M. Champion

AChampion@gibsondunn.com

200 Park Avenue

New York, NY 10166

(212) 351-4000

*Counsel for Plaintiffs Pharo Gaia
Fund, Ltd. and Pharo Macro Fund,
Ltd.*